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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LADARRIUS COOLEY, individually and on
behalf of others similarly situated,

Plaintiff,

v.

WINCO FOODS, LLC, a Delaware limited-
liability company,

Defendant.

Case No. 2:20-cv-00256-APG-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND TO
COMPLAINT**

[FIRST REQUEST]

Defendant WINCO FOODS, LLC (“WinCo”), by and through its counsel KEMP JONES, LLP, and SEYFARTH SHAW, LLP, and Plaintiff LADARRIUS COOLEY, individually and on behalf of all others similarly situated (hereinafter “Plaintiff”), by and through his counsel of record, THE LAW OFFICES OF CRAIG B. FRIEDBERG, ESQ., KAUFMAN P.A., and AHDOOT & WOLFSON, P.C., hereby stipulate and agree as follows:

1. On February 6, 2020, Plaintiff filed his Complaint against WinCo. ECF No. 1. On or about February 7, 2020, Plaintiff served the Summons and Complaint on WinCo’s

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resident agent in Delaware. The present deadline for WinCo to respond is Friday, February 28, 2020, which the parties hereby agree to extend.

2. Plaintiff and WinCo agree that WinCo shall have an extension of time up to and including Friday, March 27th, 2020, to file a response to Plaintiff's Complaint. This is the first request for an extension of time to respond to the Complaint.

3. This extension is requested to account for the time WinCo, an out-of-state limited-liability company, expended to retain counsel. The requested extension will permit WinCo and its counsel sufficient time to review and appropriately respond to Plaintiff's Complaint.

4. The stipulated extension with respect to WinCo's response deadline will not prejudice the parties, nor will it impact other deadlines in this case.

DATED this 26th day of February, 2020.

DATED this 26th day of February, 2020.

KEMP JONES, LLP

KAUFMAN P.A.

By: /s/ Nathanael Rulis

By: /s/ Craig Friedberg

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: February 27, 2020